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COUNSEL FOR WPG LEGACY, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

TUESDAY MORNING CORPORATION, *et al.*¹

Debtors.

Chapter 11

Case No. 23-90001

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appear in the above-captioned chapter 11 proceedings as counsel on behalf of WPG Legacy, LLC f/k/a Washington Prime Group Inc.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Tuesday Morning Corporation (8532) ("TM Corp."); TMI Holdings, Inc. (6658) ("TMI Holdings"); Tuesday Morning, Inc. (2994) ("TMI"); Friday Morning, LLC (3440) ("FM LLC"); Days of the Week, Inc. (4231) ("DOTW"); Nights of the Week, Inc. (7141) ("NOTW"); and Tuesday Morning Partners, Ltd. (4232) ("TMP"). The location of the Debtors' service address is 6250 LBJ Freeway, Dallas, TX 75240.

("WPG"), and request that all notices given or required to be given, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, ECF notice, hand delivery, telephone or otherwise, which affect WPG or these chapter 11 bankruptcy cases to be served upon:

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PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as nor is it a consent to jurisdiction of the Bankruptcy Court over WPG, specifically but not limited to (i) its right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) its right to a trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory, or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which WPG is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments WPG expressly reserves.

[Signature Page Follows]

Dated: February 17, 2023

Respectfully submitted,

FROST BROWN TODD LLP

/s/ Ronald E. Gold

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COUNSEL FOR WPG LEGACY, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023 a true and correct copy of the foregoing Notice of Appearance and Request for Notices was sent via ECF to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Ronald E. Gold